

THE LAW OFFICES OF
FULLER, TAYLOR & HOLTON
A PROFESSIONAL CORPORATION

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August 4, 2008

Christopher Snyder, Esq.
Assistant United States Attorney
131 Clayton Street
Montgomery, Alabama 36104

VIA EMAIL – ORIGINAL TO FOLLOW VIA U.S. MAIL

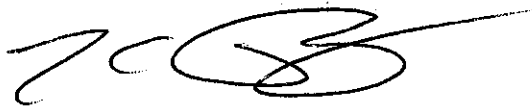
Re: *United States v. Claude Jerome Wilson*

Chris:

Per our conversation, and in accordance with the Court's standing order on disclosure, I am resending this notice which it appears Michael Peterson sent on July 30, 2008. (See attached) Again, Mr. Scarsbrook would be expected to testify to the alteration of the photograph in question and to his opinion as to whether the photograph of Claude has been digitally altered or manipulated.

As I only recently received this case, I am still reviewing the file. I am aware that Dr. Ghostly has performed an evaluation of the Defendant and am in the process of reviewing that report. I will disclose any relevant information and whether we intent to call Dr. Ghostly before C.O.B. today.

Sincerely,

A handwritten signature in black ink, appearing to read 'JCT', with a long horizontal line extending to the right.

J. Carlton Taylor
Fuller, Taylor & Holton, P.C.

FEDERAL DEFENDERS

MIDDLE DISTRICT OF ALABAMA
FEDERAL DEFENDER PROGRAM, INC.

201 MONROE STREET, SUITE 407

MONTGOMERY, AL 36104

TELEPHONE (334) 834-2099

FACSIMILE (334) 834-0353

Website: www.almfd.org

CHRISTINE A. FREEMAN
Executive Director

July 30, 2008

VIA FACSIMILE

Christopher Snyder, Esq.
Assistant United States Attorney
131 Clayton Street
Montgomery, Alabama 36104

Re: *United States v. Claude Jerome Wilson*

Dear Mr. Synder:

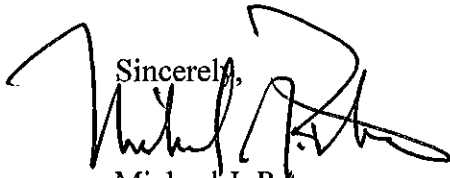
Pursuant to my obligation under the Standing Order on Discovery, I am informing you I may utilize the following as an expert witness:

Mr. Philip B. Scarsbrook
Capitol Filmworks, Inc.
744 Evanwood Drive
Montgomery, Alabama 36117

Mr. Scarsbrook would be expected to be able to testify to digital manipulation of photographs.

His CV is attached.

Sincerely,



Michael J. Petersen
Assistant Federal Defender

MJP/hw

cc: Verne Speirs

Philip B. Scarsbrook

744 Evanwood Drive, Montgomery, AL 36117 • (334) 279-6216 • phils@totalimage.com

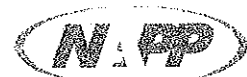


Adobe

CERTIFIED EXPERT

Photoshop Versions:

6,7,CS,CS2,CS3



National Association of Photoshop Professionals

4-time GURU Award Winner - National Association of Photoshop Professionals

Vincent Versace Award Winner - National Association of Photoshop Professionals

Digital Canvas Award Winner - National Association of Photoshop Professionals

PhotoShop User Award Winner - National Association of Photoshop Professionals

BACKGROUND SUMMARY

More than 25 years of diversified experience in professional photography, graphic design and photo-production execution and management. Demonstrated Expertise in all still-camera formats, in addition to extensive computer experience in both Mac and PC using Adobe Photoshop, Adobe Illustrator, Adobe InDesign, Quark Xpress and other graphic imaging programs. Proven success in managing photo production and coordinating activities in a multiple project team organization.

Certified by Adobe Systems as an expert in their industry standard software Photoshop. Instructor and speaker at many state and regional photographer's conventions and workshops.

PROFESSIONAL EXPERIENCE

Capitol Filmworks

1999-present

Digital Imaging Manager: Responsibilities include digital photo manipulation, image enhancement, web and pre-press design, as well as image output production for a national pro-lab serving over 200 professional photographers and digital artists in 47 states. Company representative in all issues regarding photography and image manipulation. Travel various parts of the country conducting digital workflow and Photoshop seminars.

Gayfers/JB Whites Advertising Department

1988-1999

Photographer / Photo Production Manager: Directed the efforts of the photo studio and managed the execution of sales promotion photography for a regional retail department store chain comprised of 19 stores generating \$507 million in annual sales.

- Prepared, managed and monitored photo budgets which included \$250,000 in model fees and \$35,000 in photo supplies annually.
- Developed shooting schedules, negotiated talent fees, chose and secured locations for advertising photography to improve product presentation and reduce costs by 7% in 1998.
- Directed the activities of one additional photographer and two stylists to meet constantly changing deadlines while producing just under 75 commercial setups per week resulting in an average of 72-104 preprints and over 60,000 inches of newspaper ROP per year.
- Executed award winning photography using film cameras of all formats, including digital, for fashion and product.
- Designed ROP ads and collaborated with designers on catalogs from conception through production.
- Experienced in pre-press production including scanning.

cleaning, cropping and toning images for publication.

- Created footage for television commercials for a period of two years using broadcast quality Beta equipment.

Alabama Shakespeare Festival

1986-Present

Company Photographer: Photograph all productions and special events using color and Black/White prints and slides for publicity in newspapers, magazines and promotional brochures.

Auburn University at Montgomery

1985-1988

Manager of Photographic Services: Responsible for all photographic work for university use, as well as marketing photographs to the news media; maintaining negative files and records of all billing for photographic work.

- Writing and distributing news releases about students, faculty and staff.
- Initiated story ideas about the university with the press.
- Worked extensively with the news media, scheduling interviews and assisting with arrangements while on campus.

Adjunct Instructor: Teaching five-hour credit courses in photojournalism for the communications department and intermediate/advanced photography for the fine arts department.

Montgomery Advertiser/ Alabama Journal Newspapers

1981-1985

Chief Photographer: Reported directly to the publisher. Responsible for budget, organization, and quality control of 10-person photographic department.

- Managed departmental annual budget, including supplies, travel expenses, salaries, inventories, as well as one and five-year plans for capitol expenditures.
- Supervised all black-and-white or color photography, as well as four-color separation system for color reproduction.
- Participated in the design and layout of special features and photo-essays. Met seven deadlines daily, responsible for coverage of all major news events in Alabama.

Montgomery Advertiser/ Alabama Journal Newspapers

1979-1981

Staff Photographer

Additional work experience: Worked on assignment for:

Associated Press
United Press International
New York Times
Newsweek

Boston Globe
Newsday
Southern Living

cleaning, cropping and toning images for publication.

- Created footage for television commercials for a period of two years using broadcast quality Beta equipment.

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United Press International

New York Times

Newsweek

Boston Globe

Newsday

Southern Living

Addendum:**Awards and Recognition**

- 2007 National Association of Photoshop Professionals
GURU Award for Photoshop Restoration (Presented at their national convention, April. 2007, Tampa, FL.).
- 2006 National Association of Photoshop Professionals
GURU Award for Photoshop Restoration (Presented at their national convention, March. 2006, Miami, FL.).
- 2006 National Association of Photoshop Professionals
Digital Canvas Award for Photoshop Retouching.
- 2005 National Association of Photoshop Professionals
GURU Award for Photoshop Design (Presented at their national convention, Sept. 2005, Boston MA.).
- 2003 National Association of Photoshop Professionals
Vincent Versace Award for Photographic Excellence
(Presented at their national convention, Sept. 2003, Tampa, FL.)
- 2002 National Association of Photoshop Professionals
GURU Award for Photoshop Design (Presented at their national convention, Sept. 2003, Tampa, FL.).
- 1997 Montgomery Advertising Federation Citation of Excellence Award **"Tie One On"**.
Montgomery Advertising Federation Citation of Excellence Award **"Something Wild"**.
- 1996 Montgomery Advertising Federation Addy Award **"Designer Basics"**.
Montgomery Advertising Federation Citation of Excellence Award **"Levi's Truckload Sale"**.
Montgomery Advertising Federation Citation of Excellence Award **"Back to School"**.
- 1995 Montgomery Advertising Federation Citation of Excellence Award **"Father's Day Campaign"**.
- 1994 Montgomery Advertising Federation Addy Award
"Profiles '94 Juniors".
Montgomery Advertising Federation Addy Award
"Back to School".
Montgomery Advertising Federation Citation of Excellence Award **"Signature Essentials"**.
Montgomery Advertising Federation Citation of Excellence Award **"Dana Buchman Suits"**.
Montgomery Advertising Federation Citation of Excellence Award **"Father's Day"**.
- 1993 Montgomery Advertising Federation Addy Award
"Back to School, The In Look for Every Outlook".
- 1985 Special Merit Award-District III-Council for Advancement and Support of Education.
- 1985 Award of Excellence-1st Place--Public Relations Council of Alabama.
- 1983 Best News Photo-color-1st Place--Associated Press.
Best Feature Photo-color-2nd Place--Associated Press .
Feature Photo-color-3rd Place--Associated Press.
- 1982 Best News Photo-3rd Place--Alabama Press Assoc.
- 1981 Best Sports Photo-3rd Place--Associated Press.
Best News Photo-3rd Place--Alabama Press Assoc.
- 1980 Photo of the Year-1st Place--Advertiser-Journal.
Photo of the Year-2nd Place--Advertiser-Journal.
- 1979 Best Sports Photo-1st Place--Associated Press.
Best Color Photo-3rd Place--Associated Press.

1978 Best Color Feature-2nd Place--Alabama Press Photographer's Association.
Best Feature Photo-1st Place--Associated Press.
Best Feature Photo-2nd Place--Associated Press.
Best Sports Photo-3rd Place---Associated Press.
1977 Best News Photo-2nd Place--Alabama Press Assoc.

MODE = MEMORY TRANSMISSION

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END=JUL-30 14:29

FILE NO.=333

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CHRISTINE A. FREEMAN
Executive Director

FAX COVER LETTER

July 30, 2008

PLEASE DELIVER THE FOLLOWING AS SOON AS POSSIBLE:

TO: Christopher Snyder, Esq.

Fax No: 223-7135

Re: USA v. Claude Wilson

FROM: Michael Petersen, Esq.

NUMBER OF PAGES (including the cover sheet): 7

If you have any questions or concerns, please contact our office.

Please call 334-834-2099 immediately if you do not receive the entire fax.

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